



May 31, 2023

Hon. Vera M. Scanlon, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, 1214 South  
Brooklyn, New York 11201

By Electronic Filing.

Re: Payamps v. City of New York, 22-cv-00563

Dear Judge Scanlon:

We are co-counsel for Plaintiff in this matter. We respectfully request that the Court issue an Order permitting Plaintiff leave to file the attached proposed amended complaint largely replacing the Doe Defendants for names of NYPD members provided by the City on May 19, 2023. Defendants do not object to Plaintiff amending the Complaint to name these individuals, whose names appear in the caption of the attached. The only other major amendment is paragraph 8 of the attached.

We thank the Court for its time.

Respectfully submitted,

/s/

Jessica Massimi  
*Pronouns: She/Her*  
**COHEN&GREEN P.L.L.C.**  
*Attorneys for Plaintiff*  
1639 Centre St., Suite 216  
Ridgewood, New York 11385

CC:

All relevant parties by ECF.



COHEN & GREEN

Page 2 of 2